

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

United States of America,	:	
Plaintiff,	:	Case No. 2:21-cr-00171
vs.	:	JUDGE SARGUS
Carlos Manuel Rodriguez Brime,	:	
Defendant.	:	

**UNOPPOSED MOTION TO CONTINUE TRIAL AND MOTION DEADLINES**

Now comes the defendant, Carlos Manuel Rodriguez Brime, through counsel, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and moves this Court to continue trial currently scheduled for January 31, 2021 for a period of at least 45 days. Additionally, the defendant moves to extend all other dates and deadlines listed in the scheduling Order (Doc. #33), for a period commensurate with the new trial date. The grounds for this motion are set forth in the attached Memorandum. Undersigned counsel submits that the requested extension would serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. §3161(h)(7)(A) and (B)(IV). Counsel for the government does not oppose the requested continuance.

Respectfully submitted,

DEBORAH L. WILLIAMS  
FEDERAL PUBLIC DEFENDER

/s/ Laura E. Byrum  
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Laura E. Byrum (VA 48150)  
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Attorney for Defendant  
Carlos Manuel Rodriguez Brime

**MEMORANDUM IN SUPPORT OF MOTION**

Mr. Brime is charged in a three-count Indictment alleging violations of 18 U.S.C. §§ 248(a)(1), 875(c) and 844(e). The matter is presently scheduled for trial beginning on January 31, 2021.

The government has provided timely discovery to the defense. Undersigned counsel is still in the process of reviewing said discovery, both individually and with Mr. Brime. In addition, undersigned counsel is still in the process of conducting independent investigation in preparation for trial. A continuance of not less than 45 days is needed in order to allow sufficient time to file any necessary pretrial motions and prepare for trial. A continuance of this matter will also for the parties to determine if this matter may be resolved short of trial.

Counsel for Mr. Brime submits that the ends of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(7)(A). The failure to grant the requested continuance would deny counsel for the defendant reasonable time necessary for effective preparation taking into account the exercise of due diligence. 18 U.S.C. § 3161 (h)(7)(B)(iv). Counsel for the government does not oppose the requested continuance.

**WHEREFORE**, for the reasons set forth above, Defendant Carlos Manuel Rodriguez Brime, through undersigned counsel, respectfully requests this Court grant this motion to continue.

Respectfully submitted,

DEBORAH L. WILLIAMS  
FEDERAL PUBLIC DEFENDER

/s/ Laura E. Byrum  
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Attorney for Defendant

Carlos Manuel Rodriguez Brime

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Laura E. Byrum

Laura E. Byrum (VA 48150)

Assistant Federal Public Defender